

EXHIBIT

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MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

January 17, 2014

Amy Rothstein, Esq.
Salerno & Rothstein
221 Schultz Hill Road
Pine Plains, NY 12567

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)


Dear Amy:

I write on behalf of the Plaintiffs' Executive Committees in response to your January 6, 2014 correspondence relating to Plaintiffs' Responses to Defendant Yassin Kadi's First Set of Jurisdictional Requests for Production of Documents to all Plaintiffs. Specifically, you have asked whether plaintiffs are withholding responsive discovery documents on the basis of their objection that defendant Kadi's document requests are "essentially disguised contention interrogatories." Without waiving said objection, I can confirm on behalf of all plaintiffs that have asserted claims against your client that no documents are being withheld from production on the basis of that objection.

Plaintiffs further agree with your recommendation to defer discussion of plaintiffs' discovery responses and objections to a later date.

Finally, plaintiffs are agreeable to providing you with electronic copies of all documents and indices that were produced to the merits discovery defendants on August 30, 2012, the rolling document production deadline ordered by Magistrate Judge Frank Maas. Those documents will be sent to your office in the next week.

Sincerely,


J. SCOTT TARBUTTON, ESQ.
THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

cc: Members of Plaintiffs' Executive Committees (Via Email)